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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: NOV 20 1986

SUBJECT: Jefferson/Conner Industrial Revitalization Project  
Draft Environmental Impact Statement

FROM: Bonnie L. Eleder, RPM  
CERCLA Enforcement Section

TO: William D. Franz, Chief  
Environmental Review Branch

Attached are my comments on the above-named document, as per your memo to Norman Niedergang, dated November 6, 1985. These comments pertain to the discussion of the identification and disposal of solid and hazardous wastes.

Attachment

bcc: Norman Niedergang, CES  
Bonnie Eleder, CES

A review has been completed of the Jefferson/Conner Industrial Revitalization (JCIR) Project Draft Environmental Impact Statement (DEIS), focusing particularly on the discussion of the identification and disposal of solid and hazardous wastes. Those sections are identified as pages IV 27-30, V 17-30, and Appendices H, J.

The major solid and hazardous waste concerns which should be addressed for the JCIR Project can be summed up as follow:

- 1) RCRA closure of the Chrysler facility;
- 2) Investigation of Project area to identify hazardous and toxic substances and wastes, and any areas of contamination;
- 3) Development of remedial actions addressing that identified in 2);
- 4) Implementation of the selected remedial actions; and
- 5) Compliance with applicable laws and regulations such as RCRA, TSCA, etc.

A review of those sections identified above indicates that the DEIS does not necessarily address all of these concerns sufficiently. There is a lack of organization in the piecemeal approach described for the investigation and remedial-mitigation actions, and the Hazardous Waste Management Plan (HWMP). It is suggested that the approach be re-organized to include the elements of Phase I, Phase II, and the HWMP together as one investigation and remedial action effort. Thus, these environmental concerns would be handled in a more time-effective and cost-effective manner. The approach suggested can be summarized as follows:

- 1) The investigation portion described in Phases I and II should include the investigatory elements of the HWMP, namely, those numbered 1, 2, 3, 6, 8, 13, 14, 15 (as they are listed on pages V 29-30).
- 2) The remedial-mitigation portion should incorporate those elements numbered 4, 5, 7, 9, 14, 15 of the HWMP.
- 3) Storm sewer sampling should be a task under the investigation portion.
- 4) Two phases for the investigation portion is a good approach because the ("mini") first phase allows the second to be tailored or focused to the needs of the Project.
- 5) The actual demolition of buildings, excavation, and removal and disposal of the debris, (which may include additional sampling, analysis, and removal of contaminated materials), could constitute the final phases of the Project (elements numbered 10, 11, 12 of the HWMP would fit in here).

A suggested format would be:

#### I. Project Area Investigation

##### A. Initial Site Survey

1. Includes elements of site inspections outlined in DEIS, pages V 19-21.
2. Inspection of buildings to identify potential/actual sources of hazardous/toxic materials/wastes.
3. A survey of above and below ground tanks, drums, and other containers.
4. Identify areas of spills, leaks, previous disposal of waste.
5. Inspection of residential areas.

6. Identification of PCB and asbestos wastes and holding areas.
  7. Documents searches of properties and State/Federal files, as described on page V 20, and to identify any old dump sites.
- B. Geophysical Methods Investigation
    1. Magnetic/magnetometer survey
    2. Soil borings/soil sampling
    3. Monitor well construction and development
  - C. Hydrogeologic Investigation
    1. Groundwater sampling
  - D. Characterization of Wastes
    1. RCRA hazardous
    2. PCB
    3. Asbestos
    4. Non-hazardous

[This would require sampling, analysis, estimation of volumes.]
  - E. Storm Sewer Sampling
  - F. Evaluation of Data
- II. Remedial Actions Addressing Results of Investigation
- A. Development of, regarding
    1. Waste disposal
    2. Clean-up of contaminated areas
  - B. Evaluation and selection of actions
  - C. Implementation of actions
- III. Demolition of Buildings/Excavation
- A. Demolition
  - B. Disposal of debris
  - C. Additional sampling, as needed
  - D. Additional remedial action, as needed
  - E. Excavation
  - F. Disposal of any excavated waste

In addition, there are several questions and/or recommendations for specific portions of the DEIS. These are as follow:

- 1) Site Investigations - Phase I (page V 22-25):
  - a. The number of groundwater samples to be collected is confusing. Each groundwater monitor well should be sampled at least once.
  - b. The reasoning behind the choice of parameters and detection limits for the sampling program is unclear. For example, why is the EP Toxicity test being used for groundwater samples? It is recommended that the Hazardous Substances List (HSL) from EPA's Contract Lab Program (CLP) be used for all of the environmental samples. The analytical procedures are also recommended to be consistent with those specified by EPA's CLP. With the phased approach given in the DEIS, the first phase could concentrate on a sampling of "key" locations, with all parameters tested for; then the second phase could be tailored to the results of the first phase. That is, the parameters chosen would be based on the initial results with only select parameters being analyzed for. For waste samples, the requirements of RCRA would have to be followed, specifically those outlined in 40CFR, Part 261, the definition of a hazardous waste.
  - c. In order to maintain consistency and uniformity in the soil and groundwater samples, all borings should be made using the same procedure.
- 2) Site Investigations - Phase II (page V 26):
  - a. Same comments a, b, c as above.
- 3) Site Investigations - Storm Sewer Sampling (Page V26):
  - a. Same comments as above concerning parameters and methods of analysis.
  - b. How will the samples be collected?
  - c. The list of parameters chosen can be narrowed down based upon the results of Phase I.
- 4) Site Investigations - HWMP (pages V 26-30):
  - a. (Page V 28; para. 2) There is the possibility that buried waste may be encountered. This should also be addressed.
  - b. (Page V 28; para. 5) What types of actions would be considered in the mitigation and clean-up plans referred to? What criteria will be used for selection of these actions?
  - c. (Page V 29, no. 8) What of above grade storage tanks?

Miscellaneous comments follow:

- 1) In addition to a plan outlining the site investigation, remedial actions, demolition, and excavation, other related issues need to be addressed, perhaps as appendices to the DEIS. These issues include quality assurance/quality control, health and safety, and emergency action planning.
- 2) Since it is probable that this project will result in the generation of RCRA hazardous waste, a discussion covering the requirements for

notification, waste handling and storage, and waste transport and disposal should be in the DEIS.

- 3) A discussion of how all other applicable environmental laws and regulations will be met should be included.

These sections of the DEIS pertaining to waste identification and disposal provide a good framework for the development of a plan addressing the waste issue. A re-organization of the tasks to be undertaken and more detailed discussions of each of the tasks will result in a more effective approach to the waste identification and disposal issue.

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